

June 27, 2025

VIA ECF

Hon. Jeannette A. Vargas
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Zayas et al v. Aviles-Ramos et al*, 1:25-cv-01880-JAV

Dear Judge Vargas:

As Your Honor may recall, the undersigned represents the Plaintiffs in the above referenced matter. In accordance with Your Honor's Individual Rules of Practice, Rule 5.L., as well as Federal Rules of Civil Procedure Rule 65, Plaintiffs respectfully notify the Court of their intentions to file a Temporary Restraining Order on June 27, 2025.

In accordance with Your Honor's Individual Rules of Practice, Plaintiffs have provided notice of the intended filing to counsel for Defendants and they have not consented to temporary injunctive relief. Plaintiffs are otherwise in compliance with Rule 65 due to the unusual procedural posture of the case and defense counsel having made appearances on ECF and therefore receiving all ECF notices.

Plaintiffs thank the Court for its courtesy and consideration in this matter.

/s/ Kenneth Willard

Kenneth Willard, Esq.

Cc: All Counsel of Record via ECF.